

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.

Case No.: 1:20-cv-09713-LLS

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION
(TWO) LIMITED, WELLS FARGO TRUST
COMPANY, N.A., solely in its capacity as
OWNER TRUSTEE, and UMB BANK,
N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

**DECLARATION OF DAVID G. HOSENPUD IN SUPPORT OF
LETTER MOTION TO FILE UNDER SEAL**

I, David G. Hosenpud, declare as follows:

1. I am one of the attorneys in this matter representing Plaintiff, Frontier Airlines, Inc. I am knowledgeable about the facts herein and make this declaration attaching exhibits that are subject to the Letter Motion to File Under Seal. These exhibits are referenced in Frontier Airlines' Letter Response to Defendant's Letter Motion to request a pre-motion conference regarding a protective order precluding the depositions of Gerald Ma and Francis Lee.¹
2. Attached to my declaration as Exhibit 1 is a true and correct copy of an e-mail dated April 7, 2020, from Paul Sheridan to Gerald Ma.
3. Attached to my declaration as Exhibit 2 is a true and correct copy of an e-mail dated April 22, 2020, from Gerald Ma to Jane O'Callaghan.

¹ ECF No. 77.

4. Attached to my declaration as Exhibit 3 is a true and correct copy of a text message dated April 24, 2020, from Jane O'Callaghan to Robert Fanning.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4 2022.

s/David G. Hosenpud

David G. Hosenpud